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In the above example, the allowable depreciation on the 1954 acquisitions totals \$11,200. This amount when increased by salvage realized in the amount of \$800, equals the entire cost or other basis of the 1954 acquisitions (\$12,000).

(c) *Change in estimated useful life.* In the declining balance method when a change is justified in the useful life estimated for an account, subsequent computations shall be made as though the revised useful life had been originally estimated. For example, assume that an account has an estimated useful life of ten years and that a declining balance rate of 20 percent is applicable. If, at the end of the sixth year, it is determined that the remaining useful life of the account is six years, computations shall be made as though the estimated useful life was originally determined as twelve years. Accordingly, the applicable depreciation rate will be 16⅔ percent. This rate is thereafter applied to the unrecovered cost or other basis.

[T.D. 6500, 25 FR 11402, Nov. 26, 1960, as amended by T.D. 6712, 29 FR 3653, Mar. 24, 1964]

§ 1.167(b)-3 Sum of the years-digits method.

(a) *Applied to a single asset*—(1) *General rule.* Under the sum of the years-digits method annual allowances for depreciation are computed by applying changing fractions to the cost or other basis of the property reduced by estimated salvage. The numerator of the fraction changes each year to a number which corresponds to the remaining useful life of the asset (including the year for which the allowance is being computed), and the denominator which remains constant is the sum of all the years digits corresponding to the estimated useful life of the asset. See section 167(c) and § 1.167(c)-1 for restrictions on the use of the sum of the years-digits method.

(i) *Illustrations.* Computation of depreciation allowances on a single asset under the sum of the years-digits method is illustrated by the following examples:

Example (1). A new asset having an estimated useful life of five years was acquired on January 1, 1954, for \$1,750. The estimated salvage is \$250. For a taxpayer filing his re-

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turns on a calendar year basis, the annual depreciation allowances are as follows:

Year	Cost or other basis less salvage	Fraction ¹	Allowable depreciation	Depreciation reserve
1954	\$1,500	4/15	\$500	\$500
1955	1,500	3/15	400	900
1956	1,500	2/15	300	1,200
1957	1,500	1/15	200	1,400
1958	1,500		100	1,500
Unrecovered value (salvage)				\$250

¹ The denominator of the fraction is the sum of the digits representing the years of useful life, i.e., 5, 4, 3, 2, and 1, or 15.

Example (2). Assume in connection with an asset acquired in 1954 that three-fourths of a year's depreciation is allowable in that year. The following illustrates a reasonable method of allocating depreciation:

	Depreciation for 12 months	Allowable depreciation		
		1954	1955	1956
1st year	\$500	(3/4) \$375	(1/4) \$125
2d year	400	(3/4) 300	(1/4) \$100
3d year	300	(3/4) 225
Total		375	425	325

(ii) *Change in useful life.* Where in the case of a single asset, a change is justified in the useful life, subsequent computations shall be made as though the remaining useful life at the beginning of the taxable year of change were the useful life of a new asset acquired at such time and with a basis equal to the unrecovered cost or other basis of the asset at that time. For example, assume that a new asset with an estimated useful life of ten years is purchased in 1954. At the time of making out his return for 1959, the taxpayer finds that the asset has a remaining useful life of seven years from January 1, 1959. Depreciation for 1959 should then be computed as though 1959 were the first year of the life of an asset estimated to have a useful life of seven years, and the allowance for 1959 would be 7/28 of the unrecovered cost or other basis of the asset after adjustment for salvage.

(2) *Remaining life*—(i) *Application.* Under the sum of the years-digits

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method, annual allowances for depreciation may also be computed by applying changing fractions to the unrecovered cost or other basis of the asset reduced by estimated salvage. The numerator of the fraction changes each year to a number which corresponds to the remaining useful life of the asset (including the year for which the allowance is being computed), and the denominator changes each year to a number which represents the sum of the digits corresponding to the years of estimated remaining useful life of the asset. For decimal equivalents of such fractions, see Table I of subdivision (ii) of this subparagraph. For example, a new asset with an estimated useful life of 10 years is purchased January 1, 1954, for \$6,000. Assuming a salvage value of \$500, the depreciation allowance for 1954 is \$1,000 ($\$5,500 \times 0.1818$, the applicable rate from Table I). For 1955, the unrecovered balance is \$4,500, and the remaining life is 9 years. The depreciation allowance for 1955 would then be \$900 ($\$4,500 \times 0.2000$, the applicable rate from Table I).

(ii) *Table I.* This table shows decimal equivalents of sum of the years-digits fractions corresponding to remaining lives from 1 to 100 years.

TABLE I—DECIMAL EQUIVALENTS FOR USE OF SUM OF THE YEARS-DIGITS METHOD, BASED ON REMAINING LIFE

Remaining life (years)	Decimal equivalent
100.0	0.0198
99.90198
99.80198
99.70199
99.60199
99.50199
99.40199
99.30199
99.20200
99.10200
99.00200
98.90200
98.80200
98.70201
98.60201
98.50201
98.40201
98.30201
98.20202
98.10202
98.00202
97.90202
97.80202
97.70203
97.60203
97.50203
97.40203

TABLE I—DECIMAL EQUIVALENTS FOR USE OF SUM OF THE YEARS-DIGITS METHOD, BASED ON REMAINING LIFE—Continued

Remaining life (years)	Decimal equivalent
97.30203
97.20204
97.10204
97.00204
96.90204
96.80204
96.70205
96.60205
96.50205
96.40205
96.30206
96.20206
96.10206
96.00206
95.90206
95.80207
95.70207
95.60207
95.50207
95.40207
95.30208
95.20208
95.10208
95.00208
94.90209
94.80209
94.70209
94.60209
94.50209
94.40210
94.30210
94.20210
94.10210
94.00211
93.90211
93.80211
93.70211
93.60211
93.50212
93.40212
93.30212
93.20212
93.10213
93.00213
92.90213
92.80213
92.70213
92.60214
92.50214
92.40214
92.30214
92.20215
92.10215
92.00215
91.90215
91.80216
91.70216
91.60216
91.50216
91.40216
91.30217
91.20217
91.10217
91.00217
90.90218
90.80218
90.70218
90.60218
90.50219

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TABLE I—DECIMAL EQUIVALENTS FOR USE OF SUM OF THE YEARS-DIGITS METHOD, BASED ON REMAINING LIFE—Continued

Remaining life (years)	Decimal equivalent
90.40219
90.30219
90.20219
90.10220
90.00220
89.90220
89.80220
89.70221
89.60221
89.50221
89.40221
89.30221
89.20222
89.10222
89.00222
88.90222
88.80223
88.70223
88.60223
88.50223
88.40224
88.30224
88.20224
88.10224
88.00225
87.90225
87.80225
87.70225
87.60226
87.50226
87.40226
87.30226
87.20227
87.10227
87.00227
86.90228
86.80228
86.70228
86.60228
86.50229
86.40229
86.30229
86.20229
86.10230
86.00230
85.90230
85.80230
85.70231
85.60231
85.50231
85.40231
85.30232
85.20232
85.10232
85.00233
84.90233
84.80233
84.70233
84.60234
84.50234
84.40234
84.30234
84.20235
84.10235
84.00235
83.90236
83.80236
83.70236
83.60236

TABLE I—DECIMAL EQUIVALENTS FOR USE OF SUM OF THE YEARS-DIGITS METHOD, BASED ON REMAINING LIFE—Continued

Remaining life (years)	Decimal equivalent
83.50237
83.40237
83.30237
83.20238
83.10238
83.00238
82.90238
82.80239
82.70239
82.60239
82.50240
82.40240
82.30240
82.20240
82.10241
82.00241
81.90241
81.80242
81.70242
81.60242
81.50242
81.40243
81.30243
81.20243
81.10244
81.00244
80.90244
80.80244
80.70245
80.60245
80.50245
80.40246
80.30246
80.20246
80.10247
80.00247
79.90247
79.80248
79.70248
79.60248
79.50248
79.40249
79.30249
79.20249
79.10250
79.00250
78.90250
78.80251
78.70251
78.60251
78.50252
78.40252
78.30252
78.20253
78.10253
78.00253
77.90253
77.80254
77.70254
77.60254
77.50255
77.40255
77.30255
77.20256
77.10256
77.00256
76.90257
76.80257
76.70257

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TABLE I—DECIMAL EQUIVALENTS FOR USE OF SUM OF THE YEARS-DIGITS METHOD, BASED ON REMAINING LIFE—Continued

Remaining life (years)	Decimal equivalent
76.60258
76.50258
76.40258
76.30259
76.20259
76.10259
76.00260
75.90260
75.80260
75.70261
75.60261
75.50261
75.40262
75.30262
75.20262
75.10263
75.00263
74.90264
74.80264
74.70264
74.60265
74.50265
74.40265
74.30266
74.20266
74.10266
74.00267
73.90267
73.80267
73.70268
73.60268
73.50268
73.40269
73.30269
73.20270
73.10270
73.00270
72.90271
72.80271
72.70271
72.60272
72.50272
72.40272
72.30273
72.20273
72.10274
72.00274
71.90274
71.80275
71.70275
71.60275
71.50276
71.40276
71.30277
71.20277
71.10277
71.00278
70.90278
70.80279
70.70279
70.60279
70.50280
70.40280
70.30280
70.20281
70.10281
70.00282
69.90282
69.80282

TABLE I—DECIMAL EQUIVALENTS FOR USE OF SUM OF THE YEARS-DIGITS METHOD, BASED ON REMAINING LIFE—Continued

Remaining life (years)	Decimal equivalent
69.70283
69.60283
69.50284
69.40284
69.30284
69.20285
69.10285
69.00286
68.90286
68.80287
68.70287
68.60287
68.50288
68.40288
68.30289
68.20289
68.10289
68.00290
67.90290
67.80291
67.70291
67.60292
67.50292
67.40292
67.30293
67.20293
67.10294
67.00294
66.90295
66.80295
66.70295
66.60296
66.50296
66.40297
66.30297
66.20298
66.10298
66.00299
65.90299
65.80299
65.70300
65.60300
65.50301
65.40301
65.30302
65.20302
65.10303
65.00303
64.90303
64.80304
64.70304
64.60305
64.50305
64.40306
64.30306
64.20307
64.10307
64.00308
63.90308
63.80309
63.70309
63.60310
63.50310
63.40311
63.30311
63.20312
63.10312
63.00313
62.90313

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TABLE I—DECIMAL EQUIVALENTS FOR USE OF SUM OF THE YEARS-DIGITS METHOD, BASED ON REMAINING LIFE—Continued

Remaining life (years)	Decimal equivalent
62.80313
62.70314
62.60314
62.50315
62.40315
62.30316
62.20316
62.10317
62.00317
61.90318
61.80318
61.70319
61.60319
61.50320
61.40320
61.30321
61.20322
61.10322
61.00323
60.90323
60.80324
60.70324
60.60325
60.50325
60.40326
60.30326
60.20327
60.10327
60.00328
59.90328
59.80329
59.70329
59.60330
59.50331
59.40331
59.30332
59.20332
59.10333
59.00333
58.90334
58.80334
58.70335
58.60336
58.50336
58.40337
58.30337
58.20338
58.10338
58.00339
57.90340
57.80340
57.70341
57.60341
57.50342
57.40342
57.30343
57.20344
57.10344
57.00345
56.90345
56.80346
56.70347
56.60347
56.50348
56.40348
56.30349
56.20350
56.10350
56.00351

TABLE I—DECIMAL EQUIVALENTS FOR USE OF SUM OF THE YEARS-DIGITS METHOD, BASED ON REMAINING LIFE—Continued

Remaining life (years)	Decimal equivalent
55.90351
55.80352
55.70353
55.60353
55.50354
55.40355
55.30355
55.20356
55.10356
55.00357
54.90358
54.80358
54.70359
54.60360
54.50360
54.40361
54.30362
54.20362
54.10363
54.00364
53.90364
53.80365
53.70366
53.60366
53.50367
53.40368
53.30368
53.20369
53.10370
53.00370
52.90371
52.80372
52.70372
52.60373
52.50374
52.40374
52.30375
52.20376
52.10377
52.00377
51.90378
51.80379
51.70379
51.60380
51.50381
51.40382
51.30382
51.20383
51.10384
51.00385
50.90385
50.80386
50.70387
50.60388
50.50388
50.40389
50.30390
50.20391
50.10391
50.00392
49.90393
49.80394
49.70394
49.60395
49.50396
49.40397
49.30398
49.20398
49.10399

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TABLE I—DECIMAL EQUIVALENTS FOR USE OF SUM OF THE YEARS-DIGITS METHOD, BASED ON REMAINING LIFE—Continued

Remaining life (years)	Decimal equivalent
49.00400
48.90401
48.80402
48.70402
48.60403
48.50404
48.40405
48.30406
48.20406
48.10407
48.00408
47.90409
47.80410
47.70411
47.60411
47.50412
47.40413
47.30414
47.20415
47.10416
47.00417
46.90418
46.80418
46.70419
46.60420
46.50421
46.40422
46.30423
46.20424
46.10425
46.00426
45.90426
45.80427
45.70428
45.60429
45.50430
45.40431
45.30432
45.20433
45.10434
45.00435
44.90436
44.80437
44.70438
44.60439
44.50440
44.40440
44.30441
44.20442
44.10443
44.00444
43.90445
43.80446
43.70447
43.60448
43.50449
43.40450
43.30451
43.20452
43.10453
43.00455
42.90456
42.80457
42.70458
42.60459
42.50460
42.40461
42.30462
42.20463

TABLE I—DECIMAL EQUIVALENTS FOR USE OF SUM OF THE YEARS-DIGITS METHOD, BASED ON REMAINING LIFE—Continued

Remaining life (years)	Decimal equivalent
42.10464
42.00465
41.90466
41.80467
41.70468
41.60469
41.50471
41.40472
41.30473
41.20474
41.10475
41.00476
40.90477
40.80478
40.70480
40.60481
40.50482
40.40483
40.30484
40.20485
40.10487
40.00488
39.90489
39.80490
39.70491
39.60493
39.50494
39.40495
39.30496
39.20497
39.10499
39.00500
38.90501
38.80502
38.70504
38.60505
38.50506
38.40508
38.30509
38.20510
38.10511
38.00513
37.90514
37.80515
37.70517
37.60518
37.50519
37.40521
37.30522
37.20524
37.10525
37.00526
36.90528
36.80529
36.70530
36.60532
36.50533
36.40525
36.30536
36.20538
36.10539
36.00541
35.90542
35.80543
35.70545
35.60546
35.50548
35.40549
35.30551

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TABLE I—DECIMAL EQUIVALENTS FOR USE OF SUM OF THE YEARS-DIGITS METHOD, BASED ON REMAINING LIFE—Continued

Remaining life (years)	Decimal equivalent
35.20552
35.10554
35.00556
34.90557
34.80559
34.70560
34.60562
34.50563
34.40565
34.30566
34.20566
34.10570
34.00571
33.90573
33.80575
33.70576
33.60578
33.50580
33.40581
33.30583
33.20585
33.10586
33.00588
32.90590
32.80592
32.70593
32.60595
32.50597
32.40599
32.30600
32.20602
32.10604
32.00606
31.90608
31.80610
31.70611
31.60613
31.50615
31.40617
31.30619
31.20621
31.10623
31.00625
30.90627
30.80629
30.70631
30.60633
30.50635
30.40637
30.30639
30.20641
30.10643
30.00645
29.90647
29.80649
29.70651
29.60653
29.50656
29.40658
29.30660
29.20662
29.10664
29.00667
28.90669
28.80671
28.70673
28.60675
28.50678
28.40680

TABLE I—DECIMAL EQUIVALENTS FOR USE OF SUM OF THE YEARS-DIGITS METHOD, BASED ON REMAINING LIFE—Continued

Remaining life (years)	Decimal equivalent
28.30682
28.20685
28.10687
28.00690
27.90692
27.80694
27.70697
27.60699
27.50702
27.40704
27.30707
27.20709
27.10712
27.00714
26.90717
26.80719
26.70722
26.60724
26.50727
26.40730
26.30732
26.20735
26.10738
26.00741
25.90743
25.80746
25.70749
25.60752
25.50754
25.40757
25.30760
25.20763
25.10766
25.00769
24.90772
24.80775
24.70778
24.60781
24.50784
24.40787
24.30790
24.20793
24.10797
24.00800
23.90803
23.80806
23.70809
23.60813
23.50816
23.40819
23.30823
23.20826
23.10830
23.00833
22.90837
22.80840
22.70844
22.60847
22.50851
22.40854
22.30858
22.20862
22.10866
22.00870
21.90873
21.80877
21.70881
21.60885
21.50888

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TABLE I—DECIMAL EQUIVALENTS FOR USE OF SUM OF THE YEARS-DIGITS METHOD, BASED ON REMAINING LIFE—Continued

Remaining life (years)	Decimal equivalent
21.40892
21.30896
21.20901
21.10905
21.00909
20.90913
20.80917
20.70921
20.60925
20.50930
20.40934
20.30939
20.20943
20.10948
20.00952
19.90957
19.80961
19.70966
19.60970
19.50975
19.40980
19.30985
19.20990
19.10995
19.01000
18.91005
18.81010
18.71015
18.61020
18.51025
18.41030
18.31036
18.21041
18.11047
18.01053
17.91058
17.81063
17.71069
17.61074
17.51080
17.41086
17.31092
17.21098
17.11105
17.01111
16.91117
16.81123
16.71129
16.61135
16.51142
16.41148
16.31155
16.21162
16.11169
16.01176
15.91183
15.81190
15.71197
15.61204
15.51211
15.41218
15.31226
15.21234
15.11242
15.01250
14.91257
14.81265
14.71273
14.61281

TABLE I—DECIMAL EQUIVALENTS FOR USE OF SUM OF THE YEARS-DIGITS METHOD, BASED ON REMAINING LIFE—Continued

Remaining life (years)	Decimal equivalent
14.51289
14.41297
14.31306
14.21315
14.11324
14.01333
13.91342
13.81350
13.71359
13.61368
13.51378
13.41387
13.31397
13.21407
13.11418
13.01429
12.91438
12.81448
12.71458
12.61469
12.51479
12.41490
12.31502
12.21514
12.11526
12.01538
11.91549
11.81561
11.71573
11.61585
11.51597
11.41610
11.31624
11.21637
11.11652
11.01667
10.91680
10.81693
10.71707
10.61721
10.51736
10.41751
10.31767
10.21783
10.11800
10.01818
9.91833
9.81849
9.71865
9.61882
9.51900
9.41918
9.31938
9.21957
9.11978
9.02000
8.92018
8.82037
8.72057
8.62077
8.52099
8.42121
8.32145
8.22169
8.12195
8.02222
7.92244
7.82267
7.72292

TABLE I—DECIMAL EQUIVALENTS FOR USE OF SUM OF THE YEARS-DIGITS METHOD, BASED ON REMAINING LIFE—Continued

Remaining life (years)	Decimal equivalent
7.62317
7.52344
7.42372
7.32401
7.22432
7.12465
7.02500
6.92527
6.82556
6.72587
6.62619
6.52653
6.42689
6.32727
6.22768
6.12811
6.02857
5.92892
5.82929
5.72969
5.63011
5.53056
5.43103
5.33155
5.23210
5.13269
5.03333
4.93379
4.83429
4.73481
4.63538
4.53600
4.43667
4.33739
4.23818
4.13905
4.04000
3.94063
3.84130
3.74205
3.64286
3.54375
3.44474
3.34583
3.24706
3.14844
3.05000
2.95088
2.85185
2.75294
2.65417
2.55556
2.45714
2.35897
2.26111
2.16364
2.06667
1.96786
1.86923
1.77083
1.67273
1.57500
1.47778
1.38125
1.28571
1.19167
1.0	1.0000

NOTE: For determination of decimal equivalents of remaining lives falling between those shown in the above table, the taxpayer may use the next longest life shown in the table, interpolate from the table, or use the following formula from which the table was derived.

$$D=2R/(W+2F)(W+1)$$

where:

D =Decimal equivalent.

R =Remaining life.

W =Whole number of years in remaining life.

F =Fractional part of a year in remaining life.

If the taxpayer desires to carry his calculations of decimal equivalents to a greater number of decimal places than is provided in the table, he may use the formula. The procedure adopted must be consistently followed thereafter.

(b) *Applied to group, classified, or composite accounts*—(1) *General rule.* The sum of the years-digits method may be applied to group, classified, or composite accounts in accordance with the plan described in subparagraph (2) of this paragraph or in accordance with other plans as explained in subparagraph (3) of this paragraph.

(2) *Remaining life plan.* The remaining life plan as applied to a single asset is described in paragraph (a)(2) of this section. This plan may also be applied to group, classified, or composite accounts. Under this plan the allowance for depreciation is computed by applying changing fractions to the unrecovered cost or other basis of the account reduced by estimated salvage. The numerator of the fraction changes each year to a number which corresponds to the remaining useful life of the account (including the year for which the allowance is being computed), and the denominator changes each year to a number which represents the sum of the years digits corresponding to the years of estimated remaining useful life of the account. Decimal equivalents of such fractions can be obtained by use of Table I under paragraph (a)(2)(ii) of this section. The proper application of this method requires that the estimated remaining useful life of the account be determined each year. This determination, of course, may be made each year by analysis, i.e., by determining the remaining lives for each of the components in the account, and averaging

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them. The estimated remaining life of any account, however, may also be determined arithmetically. For example, it may be computed by dividing the unrecovered cost or other basis of the account, as computed by straight line depreciation, by the gross cost or other basis of the account, and multiplying the result by the average life of the assets in the account. Salvage value is not a factor for the purpose of determining remaining life. Thus, if a group account with an average life of ten years had at January 1, 1958, a gross asset balance of \$12,600 and a depreciation reserve computed on the straight

line method of \$9,450, the remaining life of the account at January 1, 1958, would be computed as follows:

$$\begin{array}{rcl} \$12,600 - \$9,450 & \div & \$12,600 \times 10 \text{ years} \\ & & \text{equals} \\ & & 2.50 \text{ years.} \end{array}$$

Example. The use of the sum of the years-digits method with group, classified, or composite accounts under the remaining life plan is illustrated by the following example: A calendar year taxpayer maintains a group account to which a five-year life is applicable. Original investment, additions, retirements, and salvage recoveries are the same as those set forth in example (3) of paragraph (b) of § 1.167(b)-1.

DEPRECIATION COMPUTATIONS ON A GROUP ACCOUNT UNDER REMAINING LIFE PLAN

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Year	Asset balance Jan. 1	Current additions	Current retirements	Average asset balance	Straight line amount	Straight line reserve	Remain- ing life	Asset balance reduced by salvage	Current addi- tions re- duced by salvage	Salvage realized	Sum of the years digits depreciation			
					Col. (4)+ life	Col. (5) – Col. (3) accumu- lated Jan. 1	[Col. (1) – Col. (6)+ Col. (1)]× av- erage service life	Col. (1)× (100% – 6.67%)	Col (2)× (100% – 6.67%)		Accumu- lated re- serve Jan. 1	Unre- covered Jan. 1	Rate based on Col. (7) from Table 1	Allow- able deprec- iation
1954	\$12,000	\$6,000	¹ \$1,200	5.00	\$11,200	0.3333	\$1,866
1955	\$12,000	12,000	2,400	\$1,200	4.50	\$11,200	\$1,866	\$9,334	.3600	3,360
1956	12,000	12,000	2,400	3,600	3.50	11,200	5,226	5,974	.4375	2,614
1957	12,000	\$2,000	11,000	2,200	6,000	2.50	11,200	\$200	7,840	3,360	.5556	1,867
1958	10,000	2,000	9,000	1,800	6,200	1.90	9,333	200	7,907	1,426	.6786	968
1959	8,000	10,000	4,000	11,000	2,200	6,000	1.25	7,466	9,333	400	7,075	391	.8125	1,874
1960	14,000	2,000	13,000	2,600	4,200	3.50	13,066	5,349	7,717	.4375	3,376
1961	12,000	2,000	11,000	2,200	4,800	3.00	11,200	6,725	4,475	.5000	2,238
1962	5,000	6,963

¹ ½ year's amount.

² F=Rate based on average service life (0.3333 in this example).

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(3) *Other plans for application of the sum of the years-digits method.* Taxpayers who wish to use the sum of the years-digits method in computing depreciation for group, classified, or composite accounts in accordance with a sum of the years digits plan other than the remaining life plan described herein may do so only with the consent of the Commissioner. Request for permission to use plans other than that described shall be addressed to the Commissioner of Internal Revenue, Washington, D.C. 20224.

§ 1.167(b)-4 Other methods.

(a) Under section 167(b)(4) a taxpayer may use any consistent method of computing depreciation, such as the sinking fund method, provided depreciation allowances computed in accordance with such method do not result in accumulated allowances at the end of any taxable year greater than the total of the accumulated allowances which could have resulted from the use of the declining balance method described in section 167(b)(2). This limitation applies only during the first two-thirds of the useful life of the property. For example, an asset costing \$1,000 having a useful life of six years may be depreciated under the declining balance method in accordance with § 1.167(b)-2, at a rate of 33⅓ percent. During the first four years or ⅔ of its useful life, maximum depreciation allowances under the declining balance method would be as follows:

	Current depreciation	Accumulated depreciation	Balance
Cost of asset			\$1,000
First year	\$333	\$333	667
Second year	222	555	445
Third year	148	703	297
Fourth year	99	802	198

An annual allowance computed by any other method under section 167(b)(4) could not exceed \$333 for the first year, and at the end of the second year the total allowances for the two years could not exceed \$555. Likewise, the total allowances for the three years could not exceed \$703 and for the four years could not exceed \$802. This limitation would not apply in the fifth and sixth years. See section 167(c) and

§ 1.167(c)-1 for restriction on the use of certain methods.

(b) It shall be the responsibility of the taxpayer to establish to the satisfaction of the Commissioner that a method of depreciation under section 167(b)(4) is both a reasonable and consistent method and that it does not produce depreciation allowances in excess of the amount permitted under the limitations provided in such section.

§ 1.167(c)-1 Limitations on methods of computing depreciation under section 167(b) (2), (3), and (4).

(a) *In general.* (1) Section 167(c) provides limitations on the use of the declining balance method described in section 167(b)(2), the sum of the years-digits method described in section 167(b)(3), and certain other methods authorized by section 167(b)(4). These methods are applicable only to tangible property having a useful life of three years or more. If construction, reconstruction, or erection by the taxpayer began before January 1, 1954, and was completed after December 31, 1953, these methods apply only to that portion of the basis of the property which is properly attributable to such construction, reconstruction, or erection after December 31, 1953. Property is considered as constructed, reconstructed, or erected by the taxpayer if the work is done for him in accordance with his specifications. The portion of the basis of such property attributable to construction, reconstruction, or erection after December 31, 1953, consists of all costs of the property allocable to the period after December 31, 1953, including the cost or other basis of materials entering into such work. It is not necessary that such materials be acquired after December 31, 1953, or that they be new in use. If construction or erection by the taxpayer began after December 31, 1953, the entire cost or other basis of such construction or erection qualifies for these methods of depreciation. In the case of reconstruction of property, these methods do not apply to any part of the adjusted basis of such property on December 31, 1953. For purposes of this section, construction, reconstruction, or erection by the taxpayer begins when physical work is